

AFFIDAVIT

I, Ryan D. Anschutz, a Task Force Officer with the Federal Bureau of Investigation (FBI), Cleveland Division, being duly sworn, depose and state as follows:

1. I have been employed as a Mansfield Police Officer for approximately twelve years, and am currently assigned to the Cleveland Division, Mansfield Resident Agency's Child Exploitation Task Force. While employed by the Mansfield Police Department and assigned to the FBI, I have assisted in the investigation of federal criminal violations related to Violent Crimes and the FBI's Innocent Images National Initiative, which investigates matters involving the online sexual exploitation of children. I have gained experience through training at the FBI's Innocent Images National Initiative training center and everyday work related to conducting these types of investigations.
2. As a task force officer having received a Special Deputization from the United States Marshal's Office, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.
3. As will be shown below, there is probable cause to believe that Joseph R. Hurley used a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and such visual depiction was produced using materials that had mailed shipped and transported in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 2251(a). I am submitting this affidavit in support of an arrest warrant authorizing the arrest of Joseph R. Hurley.

PROBABLE CAUSE

4. On April 2nd, 2018 the Mansfield FBI Resident Agency Child Exploitation Task Force received request for forensic assistance from Richland County Sheriff's Office (RCSO) in reference

to Joseph R. Hurley being involved in the sexual exploitation of a child and possession of child pornography. The reports generated by RCSO indicated that Hurley was sexually abusing an 11 year old girl.

5. On April 12th, 2018 TFO Ryan D. Anschutz of the FBI Child Exploitation Task Force (CETF), was conducting a forensic exam and review of several computer hard drives, pursuant to a State issued Search Warrant. During the exam and review, TFO Anschutz located several images and videos depicting child pornography.

6. On June 6th, 2018 TFO Anschutz was conducting additional forensic exam review of a hard drive belonging to Hurley and found additional images and videos depicting child pornography and evidence of production of child pornography. In total, on the devices examined to date, 261 images and 102 videos of child pornography were observed. A sample of the child pornography are described below:

1. **a) File Name: (Hussyfan)(pthc)(r@ygold)(babyshivid) Alicia, 11yo philiphin child prostitute.mpg**

SHA1: 7CCEB7742EC61561561CB193CBA51B08121AB124A72

Description: The color video is approximately 16 minutes 41 seconds in length. The video depicts a prepubescent female laying on a bed with a white garment on, at which time when an adult male stands on the bed, she removes her clothing exposing her breasts and genitalia. The prepubescent female is then observed touching her genitalia with her hand. The prepubescent female gets up from the bed and the camera observes her sitting on top of a toilet seat and urinating into a toilet. A white adult male wearing a black mask is then observed engaging the prepubescent female in oral to genital intercourse while she lays on her back on the bed. The adult male and the prepubescent female are then observed on several different occasions engaging in genital to genital intercourse, oral to genital

intercourse, and masturbation. Near the end of the video the adult male and prepubescent female are observed engaging in oral to genital intercourse at which time the male appears to ejaculate into the prepubescent females' mouth as she spits what appears to be his ejaculate out of her mouth. The video ends with the prepubescent female and the adult male entering a shower stall.

2. **a) File Name: (PTHC) 7yo sex in serial (Hussyfan R@ygold] 6yo girl fucked and cummed on).mpg**

SHA1: DF656B9CE66D12BE24698CC8AF37DB7441DAAC6E

Description: The color video is approximately 1 minute 41 seconds in length. The video depicts a prepubescent female laying on her back engaging in genital to genital intercourse with an adult male.

3. **a) File Name: (PTHC) 7yo sex in serial (Hussyfan R@ygold] 6yo girl fucked and cummed on).mpg**

SHA1: DF656B9CE66D12BE24698CC8AF37DB7441DAAC6E

Description: The color video is approximately 1 minute 41 seconds in length. The video depicts a prepubescent female laying on her back engaging in genital to genital intercourse with an adult male.

7. During the forensic review a folder identified by the name of the juvenile victim contained 8 sexually explicit photos of the juvenile victim. It is of note that 4 photos are duplicates located in a different folder under her name and titled "Sexy". 3 of the photos are similar to one another depicting the same body position and camera angle in the photos. 2 of the sexually explicit photos are described below:

1. **a) File Name: IMG_0581.jpg**

SHA1: 07AA60F464F002B4368B606518C380BE499C40AC

Description: The color image is described as a pubescent female laying on her back on a floor completely nude with her breasts and genitalia exposed. The female's eyes appear to be closed and her arms appear to have been placed behind her head. The victim's legs positioned with her feet are flat on the ground, knees are in the air, and her legs are spread open to view her spread genitalia to the camera. The pubescent female was identified to be 16 years of age at the time of this photo.

2. a) **File Name: IMG_0585.jpg**

SHA1: EC94E27DB997D088E8F07FA789A2EF08E74D88B5

Description: The color image is described as a pubescent female laying on her back with her legs spread exposing her genitalia and anus. An adult male hand and thumb is observed spreading her genitalia apart for the camera. The pubescent female was identified to be 16 years of age at the time of this photo.

8. The location of the folder with the victim's name was found in the parent hidden folder titled "registr". In subfolders below "registr", contained various names of different females depicting sexually explicit photos of apparent children within the subfolders. A sample of the many folder names are: "66 photos of under 18 nude girls", "!!_050_NEW_MY_SWEET_13Yo_COUSIN", "Hotties", "Jailbait", "SEXY UPSKIRT – PRETEEN GIRL", "smallgrl10".

9. On June 19th, 2018 TFO Anschutz and Victim Specialist Debra Hughes-Butts made contact with the female depicted in the images described above in paragraph 7.1 and 7.2 (herein referred to as the Victim). TFO Anschutz set up a forensic interview of the Victim with a FBI Child/Adolescent Forensic Interviewer on June 26th, 2018.

10. On June 26th, 2018 an interview was conducted with the Victim at which time she advised that she had a relationship with Hurley 5 years ago in 2013 for approximately 1 month. During that time the Victim advised that she was 16 years of age and Hurley was 26 years of age. The Victim stated that they engaged in genital to genital intercourse on 3 known occasions at his then residence in Mansfield, Ohio. The Victim described the intercourse as “his penis in my vagina.” The Victim described Hurley to have lived in the basement of said residence. The Victim stated that the last time they “hung out” Hurley went upstairs and made her an alcoholic beverage for her to consume. The Victim did not observed Hurley prepare the “mixed drink” and stated that after consumption it made her “feel sleepy”. The Victim stated that she did not remember the rest of the evening/night and woke up in the morning without any clothes on and her “vagina and butt hurt”. The Victim advised that she gathered her clothing while Hurley was still sleeping, then fled the residence and called a friend to pick her up down the road. The Victim stated she later texted Hurley that she did not want contact with him anymore and “blocked him.”

11. The Victim denied knowledge of any sexually explicit photos being taken of her. The Victim did state that Hurley had an iPhone that he used to take non-sexually explicit photos of them. The Victim identified several photos shown to her in various stages of undress that occurred at Hurley’s residence. The Victim was able to identify the carpet, furniture, and bed spread that belonged to Hurley at the time. It is of note that the Victim identified the carpet and furniture depicted in the photos in which she was partially clothed. The same carpet, furniture, and bed spread were also present in the sexually explicit photos. The Victim stated that no one else was present when she and Hurley were together at his residence, noting that Hurley did not want her to meet his roommates that lived upstairs because she had braces and he told her that they would think she was “young”.

12. The metadata of the sexually explicit photos taken of The Victim, revealed that they were produced using an Apple iPhone 5. The metadata shows they were produced on March 24, 2013

between 12:23 and 12:31 pm. The geolocation data resolves to Hurley's previous address on Vonhof Blvd. in Mansfield. OH.

13. The Apple iPhone 5 was manufactured by Foxconn, based in Taiwan.

CONCLUSION

14. Based on the aforementioned factual information, your affiant respectfully submits that there is probable cause to believe that Joseph R. Hurley did use a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and such visual depiction was produced using materials that had mailed shipped and transported in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 2251(a).



Ryan D. Anschutz
Task Force Officer
Federal Bureau of Investigation

Sworn to via telephone after
submission by reliable electronic
means. Crim.Rules. 4.1; 41(d)(3)




Thomas M. Parker

United States Magistrate Judge
5:35 PM, Jun 27, 2018